

JUL 05 2024

UNITED STATES DISTRICT COURT  
WESTERN DIVISION OF NORTH CAROLINA

US DISTRICT COURT  
WESTERN DISTRICT OF NC

3:24-cv-632-KDB

MAURICE DEON RIVERS

VS

MULTACOM CORPORATION / DANGPOUNDUSA.COM

I. JURISDICTION

FEDERAL QUESTION

UNIVERSAL DECLARATION OF HUMAN  
RIGHTS

DIVERCITY OF CITIZENSHIP

II. PLAINTIFF

PLAINTIFF, MAURICE DEON RIVERS,  
NOVEMBER 20, 1980

III. DEFENDANTS

MULTACOM CORPORATION / DANGPOUNDUSA  
4987 7TH AVE  
NEW YORK, NY 10018

IV. SEE ATTACHMENT



## V. PRAYER FOR RELIEF

- ① A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF'S RIGHTS UNDER THE UNIVERSAL DECLARATION OF HUMAN RIGHTS.
- ② BANK STATEMENTS TO ALL PAYOUTS FROM PROCEEDS FROM ALL SALES EXHIBITING PLAINTIFF'S LIKENESS, NAME, AND IMAGE. (ALL TIME)
- ③ A LIST OF (NAMES) OF ALL INDIVIDUALS AND COMPANIES PAID FROM STREAMS, DOWNLOADS OR PURCHASE OF ANY VIDEO OR IMAGE CONTAINING THE PLAINTIFF'S LIKENESS, NAME OR IMAGE. (ALL TIME)
- ④ PROCEEDS FROM THE SALES (VIDEOS) OF PLAINTIFF'S IMAGE AND NAME AND LIKENESS ONLINE
- ⑤ \$800 MILLION DOLLARS FOR EMOTIONAL SUFFERING AND PAIN



⑥ CRIMINAL CHARGES PURSUED FOR THE PERPETRATORS OF FRAUDULENT COMMUNICATION WITH ACTORS FROM THE COMPLAINT OR THE COMPANY ITSELF IN ORDER TO OBTAIN ANY FINANCIAL GAIN ON BEHALF OF THE PLAINTIFF.

⑦ COMPLETE CLEARANCE ONLINE AND ELSEWHERE OF THE PLAINTIFF'S NAME, IMAGES, VIDEOS AND ASSOCIATION WITH THE COMPANY, DAWGPOUNDUSA.COM

#### VERIFICATION

I HAVE READ THE FORGOING ~~VERIFICATION~~ COMPLAINT AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION AND BELIEF AND AS TO THOSE I BELIEVE THEM TO BE TRUE.

I CERTIFY UNDER THE PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.



## COMPLAINT

IN 2009, I BEGAN A WORKING RELATIONSHIP WITH "JERRY AND ROY" WHO REPRESENT THE COMPANY DAWGPOUNDUSA. (2009-2012)

IN BETWEEN THE STATED YEARS THE PAIR ("JERRY AND ROY") ~~WOULD~~ WOULD FLY ME TO SELECT DESTINATIONS ACROSS THE COUNTRY TO FILM PORNOGRAPHY.

ON ONE OCCASSION I WAS FLEW TO "NEW YORK". I ARRIVED ONE EVENING AROUND 8:00 PM AND I ROAMED THE STREETS OF MANHATTAN WELL INTO THE NEXT AFTERNOON CONSUMING CRACK COCAINE THROUGHOUT THE NIGHT.

WHEN THE TIME FOR THE "SHOOT" ARRIVED I DECIDED THAT I DID NOT WANT TO CONTINUE AND I ASKED TO BE FLEW BACK HOME. I WAS SLEEP DEPRIVED HEAVILY INTOXICATED, INEBRIATED AND UNDER <sup>THE</sup> THROES OF CRACK COCAINE WITHDRAWAL.



"JERRY AND ROY" INSISTED AND PERSISTED AGAINST MY PROTESTS UNTIL I RELENTED. I WAS OFFERED MORE MONEY, MORE ALCOHOL AND ERECTION DRUGS ALONG WITH MARIJUANA. I DESPISED EVERY MOMENT. I FELT WORTHLESS AND DEGRADED. I SPENT THE PROCEEDS ON MORE CRACK COCAINE.

I SIGNED A WAIVER UNDER DURESS. THE CONTRACT WAS VOID BECAUSE OF IT.

SHORTLY AFTER THE FILMING OF THE EPISODE IN NEW YORK SOME ONE RELEASED THE FILMS THAT INCLUDED ME TO A FICTITIOUS FACEBOOK PROFILE THAT HAD BEFRIENDED MY FAMILY CLASSMATES AND FRIENDS.

I ATTEMPTED SUICIDE.

IN BETWEEN 2009 - PRESENT A GROUP OF PEOPLE PURPORTEDLY MEMBERS OF MY ESTRANGED FAMILY, FORMER GIRLFRIENDS A EX WIFE AND OTHERS HAVE



FORMED A "FAMILY." THIS "FAMILY"  
HAS REACHED (PURPORTEDLY) OUT  
TO THE COMPANY (DAWG POUND USA)  
THE OTHER ACTORS INVOLVED  
AS WELL AS MULTIPLE OTHERS  
IN A PLOT THAT HAS SPREAD  
MULTIPLE MILLIONS OF DOLLARS  
ACROSS MULTIPLE BANK ACCOUNTS.

ALL THIS HAS BEEN DONE  
BEHIND MY BACK, WITHOUT  
MY CONSENT. I HAVE NOT  
RECEIVED 1¢ (CENT).

I SHARED MY STORY WITH  
EVERY ONE I ~~WANTED~~ MET.

I EXPRESSED MY DISDAIN  
FOR THE VIDEOS.

THESE PEOPLE SOUGHT PROFIT  
INSTEAD

MY MOTHER CRYSTAL RIVERS,  
MY DAUGHTER'S MOTHER MELISSA  
JESSOMS, CHARMEKA HOBBS, EX FRIEND  
JENELLE SALAZAR-BUTLER, HER  
HUSBAND (CREZON) MELISSA'S  
HUSBAND (MADARIO) TAMIKA  
RIVERS (SISTER) CHRISTINA  
CHAMBERS (SISTER) JEAN CRAWFORD



UNCLE, EDARRILL RIVERS  
(BROTHER) LAVONNA RIVERS  
(AUNT) VALENTINA CAPIZZI  
(SCAM ARTIST) AND VANITY  
GARDNER ALONG WITH  
KAMECHIA CROWDER USHER  
HAVE PURPORTEDLY AT  
SOME POINT IN DIFFERENT  
PAIRS BEEN A PART OF  
THIS SCAM TO DEFRAUD  
ME AND TO GAIN FROM  
THE EXPLOITATION OF MY  
NAME AND LIKENESS ONLINE.

#### RELIEF SOUGHT

I WOULD LIKE FOR THE UNITED  
STATES GOVERNMENT TO INVESTIGATE  
EACH VIDEO DISTRIBUTED BY THIS  
COMPANY, WHERE THE PROCEEDS  
INVOLVING THE DISTRIBUTION OF  
THE VIDEOS INVOLVING MY LIKENESS  
WERE ~~DISTRIBUTED~~ DISTRIBUTED  
ALLOCATION OF THOSE FUNDS,  
THE COMPANY TO PAY ME THE  
PROFITS FROM THOSE VIDEOS  
AND THE ERADICATION



OF MY NAME AND OTHER  
VIDEOS FROM THE SITE.

I SEEK \$800 MILLION DOLLARS  
FOR PAIN SUFFERING HUMILIATION  
AND EMOTIONAL DAMAGE  
THAT I SUFFERED AFTER  
I WAS FORCED TO MAKE  
THAT VIDEO IN NEW YORK.

CRIMINAL CHARGES BROUGHT  
AGAINST ANY ONE WHO PROFITED  
BY USING MY NAME OR  
LIKENESS WITHOUT MY  
CONSENT.

OUTSIDE OF THE COMPANY  
NO ONE HAS EVER  
HAD MY CONSENT.  
NOR WILL THEY.

6-29-24

MAURICE RIVERS

